

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Daniel Ramirez Medina,
Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; MATTHEW E. HICKS,
[UNKNOWN FIRST NAME] PETER,
[UNKNOWN FIRST NAME] HERNANDEZ,
and KATHLYN LAWRENCE, U.S.
Immigration and Customs Enforcement
Officers (in their individual capacities); and
JOHN DOES 1-10 (in their individual
capacities),

Defendants.

CASE NO. 2:17-CV-00218-RSM-JPD

**STIPULATED MOTION TO
EXTEND AND CONSOLIDATE TIME
TO RESPOND AND TO MODIFY
BRIEFING SCHEDULE FOR INDIVIDUAL
DEFENDANTS' RESPONSE TO THE
SECOND AMENDED COMPLAINT**

Noted for Consideration: July 20, 2017

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19 ***LANCE HERNANDEZ, AND KATHLYN LAWRENCE,***
20 ***AS SUED IN THEIR INDIVIDUAL CAPACITIES***

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COUNSEL FOR PLAINTIFF

1 Defendants Matthew Hicks, Lance Hernandez, Taula Peter, and Kathlyn Lawrence, as sued in
2 their individual capacities (collectively, "Individual Defendants"), together with Plaintiff Daniel
3 Ramirez Medina, jointly stipulate as follows:

4 (1) The deadline for Defendants Taula Peter, Matthew Hicks, and Kathlyn Lawrence, as
5 sued in their individual capacities, to answer or otherwise respond to Second Amended Complaint is
6 July 31, 2017.

7 (2) The deadline for Defendant Lance Hernandez, as sued in his individual capacity, to
8 answer or otherwise respond to the Second Amended Complaint is August 10, 2017.

9 (3) Plaintiff has asserted four separate constitutional claims against each of the Individual
10 Defendants. The Individual Defendants intend to file motions to dismiss all of the claims asserted
11 against each of them.

12 (4) The undersigned counsel have conferred and in an effort to avoid *seriatim* response
13 dates and two overlapping briefing schedules, counsel propose that the deadlines to respond to the
14 Second Amended Complaint for all four Individual Defendants be consolidated to one date: August
15 10, 2017.

16 (5) Counsel have further conferred and in an effort to avoid the submission of four
17 separate sets of motions and opposition briefs, to reduce duplicative motion papers, and to adequately
18 address all claims and defenses, also agree to consolidate the Individual Defendants' motions to
19 dismiss and plaintiff's oppositions thereto to one single brief and further to modify the briefing
20 schedule and page limits for such motions as described below:

21 (6) The Individual Defendants' motion to dismiss the Second Amended Complaint shall
22 be filed no later than August 10, 2017, and shall be noted for consideration on October 13, 2017.
23 One brief will be filed on behalf of all four Individual Defendants and will be no longer than 48
24 pages.

(7) Plaintiff's opposition to the Individual Defendants' motion to dismiss shall be filed no later than September 25, 2017. One opposition will be filed on behalf of Plaintiff and will be no longer than 48 pages.

(8) The Individual Defendants' reply in support of their motion to dismiss shall be filed no later than October 10, 2017. One reply will be filed and will be no longer than 24 pages.

The parties jointly request that the Court enter the attached proposed order to that effect.

DATED: July 20, 2017

Seattle, Washington

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Sarah E. Whitman
Sarah E. Whitman
Trial Attorney
U.S. Department of Justice